

# **EXHIBIT 1**

**From:** [R N](#)  
**Sent:** Thursday, May 4, 2023 3:37 AM  
**To:** [Juliette Palmer White](#)  
**Subject:** Discussion

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**This Message Is From an External Sender**

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Hello,

I was wondering if Miss Shanley would be willing to move into settlement discussions. I am planning to file interrogatories on Friday but for the peace and privacy of everyone involved I would like to offer to work on a settlement together once again.

Thank you,

Robyn Hutchings

# **EXHIBIT 2**

**From:** [Juliette Palmer White](#)  
**Sent:** Monday, May 8, 2023 10:53 AM  
**To:** [R N](#)  
**Cc:** [Adam Bondy](#); [Hannah Ector](#)  
**Subject:** Shanley v. Hutchings

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Robyn, we did not receive amended written discovery responses or documents from you last Friday, which was the deadline for you to do so. Will you be serving those today? If not, we must meet and confer promptly to resolve this issue. Thank you,

Juliette



**Juliette Palmer White**  
Shareholder • Shareholder  
Salt Lake City • Direct +1 801.536.6804

# **EXHIBIT 3**

**From:** [Juliette Palmer White](#)  
**Sent:** Wednesday, May 10, 2023 10:20 AM  
**To:** [R N; dshbrain@aol.com](#)  
**Cc:** [Adam Bondy](#); [Hannah Ector](#)  
**Subject:** Re: Shanley v. Hutchings

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Robyn,

We have not heard anything from you since last week. If you do not intend to serve amended written discovery responses and/or documents, we will move the Court for relief, including sanctions for failure to comply with the Court's prior order. To be clear, you are already in violation of the Court's prior order because you failed to serve supplemental responses by the deadline or obtain an extension of time to do so. Please let us know if you are available to meet and confer on this issue promptly.

Relatedly, we are interested in continuing settlement discussions. We were expecting to receive your supplemental discovery responses prior to making an offer and remain open to continuing those discussions once that happens.

Finally, we assume that your failure to file a reply on Monday in support of your motion for summary judgment was intentional, and that you do not intend to file a reply. We will file a request to submit for decision with the Court indicating that the motion is ripe for resolution.

Juliette



**Juliette Palmer White**  
Shareholder • Shareholder  
Salt Lake City • Direct +1 801.536.6804

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**From:** Juliette Palmer White <[JWhite@parsonsbehle.com](mailto:JWhite@parsonsbehle.com)>  
**Sent:** Monday, May 8, 2023 10:53 AM  
**To:** R N <[dshbrain@gmail.com](mailto:dshbrain@gmail.com)>  
**Cc:** Adam Bondy <[ABondy@parsonsbehle.com](mailto:ABondy@parsonsbehle.com)>; Hannah Ector <[HEctor@parsonsbehle.com](mailto:HEctor@parsonsbehle.com)>  
**Subject:** Shanley v. Hutchings

Robyn, we did not receive amended written discovery responses or documents from you last Friday, which was the deadline for you to do so. Will you be serving those today? If not, we must meet and confer promptly to resolve this issue. Thank you,

Juliette



A Professional  
Law Corporation

**Juliette Palmer White**

Shareholder

**Parsons Behle & Latimer**

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# **EXHIBIT 4**

**From:** [Juliette Palmer White](#)  
**Sent:** Thursday, May 11, 2023 8:29 PM  
**To:** [R N; dshbrain@aol.com](#)  
**Cc:** [Adam Bondy](#); [Hannah Ector](#)  
**Subject:** Rule 408 Settlement Communication

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**Sensitivity:** Confidential

Robyn,

We still have not heard anything from you in response to our emails this week. At this point, you are in contempt of the Court's prior order requiring you to serve amended written discovery responses and produce documents in response to our first set of discovery requests by Friday, May 5. You are at risk of sanctions as a result of your contempt. Moreover, given the total lack of evidence to support your false statements about Ms. Shanley, we are confident Ms. Shanley will ultimately prevail in this case and that you will be held liable for her damages.

[REDACTED]

[REDACTED]

[REDACTED] We look forward to hearing from you very soon.

Sincerely,  
Juliette



**Juliette Palmer White**  
Shareholder • Shareholder  
Salt Lake City • Direct +1 801.536.6804

# **EXHIBIT 5**

**From:** [Juliette Palmer White](#)  
**Sent:** Friday, May 26, 2023 4:29 PM  
**To:** [R N](#); [dshbrain@aol.com](mailto:dshbrain@aol.com)  
**Cc:** [Adam Bondy](#); [Hannah Ector](#)  
**Subject:** RE: Rule 408 Settlement Communication

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**Sensitivity:** Confidential

Robyn,

We note that you still have not responded to any of our recent emails. Nor have you complied with Judge Bennett's recent order requiring you to produce complete written discovery responses and documents by Friday, May 5. Nor have you responded to Judge Barlow's recent order to show cause requiring you to respond in writing by May 22 to indicate whether you intend to oppose our Rule 56(d) motion or file a reply in support of your motion for summary judgment.

Please contact us immediately to discuss the status of this case and your pending discovery obligations. If we do not hear from you by Wednesday, May 31, we will assume that you are refusing to communicate or otherwise engage and proceed accordingly.

Sincerely,  
Juliette



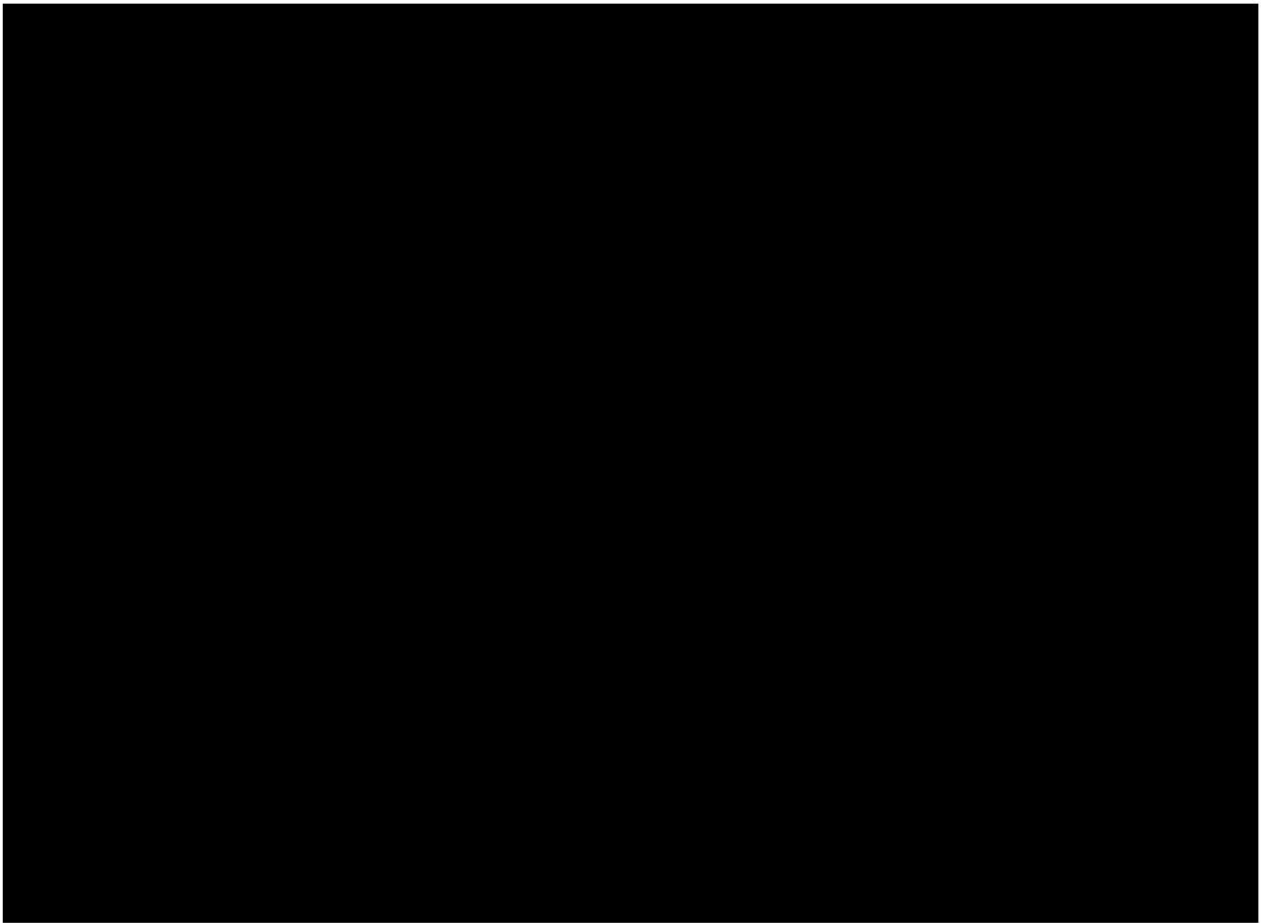
**Juliette Palmer White**  
Shareholder • Shareholder  
Salt Lake City • Direct +1 801.536.6804

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**From:** Juliette Palmer White <[JWhite@parsonsbehle.com](mailto:JWhite@parsonsbehle.com)>  
**Sent:** Thursday, May 11, 2023 8:29 PM  
**To:** [R N](#) <[dshbrain@gmail.com](mailto:dshbrain@gmail.com)>; [dshbrain@aol.com](mailto:dshbrain@aol.com)  
**Cc:** [Adam Bondy](#) <[ABondy@parsonsbehle.com](mailto:ABondy@parsonsbehle.com)>; [Hannah Ector](#) <[HEctor@parsonsbehle.com](mailto:HEctor@parsonsbehle.com)>  
**Subject:** Rule 408 Settlement Communication  
**Sensitivity:** Confidential

Robyn,

We still have not heard anything from you in response to our emails this week. At this point, you are in contempt of the Court's prior order requiring you to serve amended written discovery responses and produce documents in response to our first set of discovery requests by Friday, May 5. You are at risk of sanctions as a result of your contempt. Moreover, given the total lack of evidence to support your false statements about Ms. Shanley, we are confident Ms. Shanley will ultimately prevail in this case and that you will be held liable for her damages.



Sincerely,  
Juliette



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**Juliette Palmer White**

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